

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

DOC NO  
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UNITED STATES OF AMERICA

INDICTMENT

PETER OPPENEER  
CLERK US DIST COURT  
WD OF WI

v.

Case No. \_\_\_\_\_

18 U.S.C. § 2251(a)

MARK E. BARTZ,

Defendant.

18 CR 029 WMC

THE GRAND JURY CHARGES:

COUNT 1

On or about July 3, 2017, in the Western District of Wisconsin, the defendant,

MARK E. BARTZ,

knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, BARTZ used a ZTE Z812 cellular phone to produce a visual depiction, an image with a file name that includes a number beginning with 41973, of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a).)

COUNT 2

On or about June 26, 2017, in the Western District of Wisconsin, the defendant,

MARK E. BARTZ,

knowingly and intentionally used a minor, Minor B, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, BARTZ used

a ZTE Z812 cellular phone to produce a visual depiction, an image with a file name that includes a number beginning with 41979, of Minor B engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a).)

COUNT 3

On or about September 3, 2017, in the Western District of Wisconsin, the defendant,

MARK E. BARTZ,

knowingly and intentionally used a minor, Minor B, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, BARTZ used a ZTE Z812 cellular phone to produce a visual depiction of Minor B, an image with a file name that includes a number beginning with 41925, engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a).)

FORFEITURE ALLEGATION

As a result of the offenses charged in Counts 1-3 of this indictment, and upon conviction for violating Title 18, United States Code, Sections 2251(a), the defendant,

MARK E. BARTZ,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253, his right, title, and interest in the following:

(1) Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained.

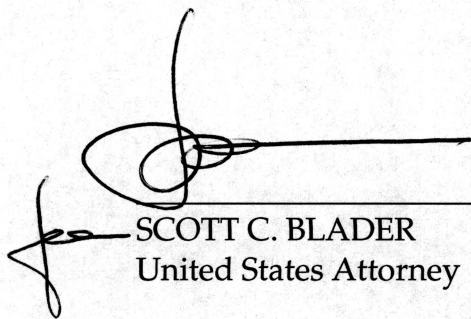
(2) Any and all property used or intended to be used to commit or to promote



the commission of the aforementioned offense, including a ZTE Z812 cellular phone.

A TRUE BILL

  
\_\_\_\_\_  
PRESIDING JUROR

  
\_\_\_\_\_  
SCOTT C. BLADER  
United States Attorney

Indictment returned: 2-15-18